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From: Beth Hovind <bethse@gmail.com>
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Subject: PLAN Pinellas

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In reviewing PLAN Pinellas, the Advocates for Race Amity, a county group meeting for the past three years, has concerns about the inclusion of equity in the overall plan. Below are listed some of the areas that we would like to see made more specific. These issues have been raised before the Local Planning Board and the county Planning Department. It is our hope that they be included in the final plan. Thank you for your attention. Please contact Beth if you have any questions.

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January 24, 2022

TESTIMONY: For Advocates for Race Amity in Pinellas County.

Representative: Beth Hovind
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Hello,

The Advocates for Race Amity in Pinellas County has reviewed PLANPinellas in the areas that impact on the people of color and low-income residents of Pinellas County—overrepresented by people of color. In the interest of sharing interests across the color barrier, we have the following concerns:

1. A plan without specific measurements is not a plan, it is a vision. Without the metrics, we really have no idea what the plan will actually accomplish.
2. The word equity is used in several places in the plan but equity, the process, is not addressed. Equity means providing all members of the county, regardless of race or income, the ability to achieve at the same level. For people who have faced years of discrimination, this means that extra efforts will need to be taken to bring them up to the current standard of living. For example, 1/3 of current residents live in cost burdened housing, minorities at a higher rate. The plan speaks to equality going forward but has no specific measures to address past inequities.

Specific comments on individual goals or strategies are below:

1. Future Land Use:

- a. FLU Policy 1.1.4: Restricting urban sprawl should be an objective of its own—not correlated with conducting analysis and other planning efforts and should have its own policies and strategies. This is too important to be overlooked.
- b. FLU Policy 1.2.2.2: “Consider regulatory opportunities” and “Consider opportunities” is so weak as to have no meaning. There is no Policy to restrict local annexations of county land which is very important to controlling what happens on county land.
- c. FLU Objective 2.2: “Encourage new population and employment growth in areas where existing infrastructure housing, jobs, and services are available to support (re)development.” Concern that this may result in the creation of silos along major highways of large apartment units—which we are already seeing—which will eventually be used to house low-income and thus minority populations and will be susceptible to poor air quality, lack of greenspace, access to services, creating the same problems that high rises have in other urban areas.
- d. FLU Strategy 2.3.1.2: Again, middle- and upper-income residents will live in their gated and greenway blessed communities while others will be forced to live in industrial areas. This needs to be rethought. It sounds convenient but most residents do not want to live near industrial areas. Also, employment opportunities have changed as evidenced by the population that now works from home. Most folks still want to live in a walkable, quiet community. Most of us have never lived

- next to my work and our guess is that most commissioners have not either. Again, the silo effect. We need better public transportation in all sections of our county.
- e. FLU Strategy 2.3.1.5: Weak effort to provide affordable housing. This needs to be strengthened to an objective and provide for the development of affordable housing purposefully, with policies and strategies to match. This entire section is written to preserve the housing patterns we continue as a result of housing segregation laws and attitudes in our county. Here is the place to develop affordable housing throughout the county to make it equitable. See “existing character” and “sensitive infill” which could be perceived as dog whistles for discrimination. Equity should be paramount in the county’s plan. We must make up for our past transgressions by using the Comprehensive Plan to produce real and achievable equity.
 - f. FLU Objective 2.5: Healthy food access: admirable but not controlled by the Comp. Plan. I would add a statement of support for healthy food access but only deal with regulatory issues and support of urban agriculture.
 - g. FLU Goal 3: Excellent use of the Comp Plan to encourage the mixing of development types, the use of ADU’s, but still uses the concept of locational criteria maintaining low income in specific areas rather than providing access to any community, reinforcing the separating of low income.
 - h. FLU Support “economic development” through the use of affordable housing? Cart before the horse? Also seen in FLU Policy 4.3
 - i. FLU 3.1.6.3 Strategy: Penny for Pinellas is one mechanism for affordable housing but should not be identified as the only mechanism. The county budget should also include affordable housing.
 - j. FLU 5: Sustainable transportation infrastructure: Once again the focus is on the Mixed-use corridors, which by definition will be hubs for public transportation and be pedestrian friendly and follow safe streets—excellent but we should be enhancing public transportation for all parts of the county so people are not limited in where they can live.

Overall: there is no discussion of the potential negative impacts on some communities of “gentrification” potential.

2. Economic Prosperity:

- a. EP Goal 1: States that the goal is to “ensure Equity and economic prosperity for its residents and businesses.” The strategies, while mentioning economic equity, do not address any attempt to make up for past inequities. To offer all the same opportunity, which these do, is not the same as providing equity.
- b. EP Strategy 1.1.2.1. states that public programs should be measured to understand and address equity impacts---but does not require that they have a strategy to resolve past inequities.
- c. EP Objective 1.3: again, relates to corridors to provide siting for these corridors—again concerned about the silo effect.
- d. EP Policy 1.3.3: concerns about gentrification and destruction of viable neighborhoods with redevelopment without safeguards.
- e. EP Policy 1.3.4.1: Jobs to housing ratio? For siting industry? Reminiscent of the old work farms?

- f. EP Objective 1.6: Again, gentrification protections need to be included.
- g. EP Objective 1.7: “Reduce involuntary displacement of residents....” Does not refer to gentrification at all? Should be-- protect neighborhood ripe for gentrification.
- h. EP Policy 1.8.5: Support housing programs that meet the needs of the service industry? Near hotels, not sure what is meant. What would these look like?

3. Housing

- a. HOU Policy 1.1.2: "Ensure freedom of Choice...for all" would be a good place to discuss equity—but it does not appear here. Choice is limited by income---perhaps some additional funding to resolve past inequities such as red-lining and specific ordinances that limited where the Black population could live.
- b. HOU Strategy: 1.1.2.1 “Maintain and enforce Fair Housing Ordinance” has appeared in every public housing plan for years yet has been rarely effective—need stronger language here.
- c. HOU Strategy 1.2.1.2.: How about the development of manufactured homes, which is not listed here? Low-income condos?
- d. HOU Strategy 1.3.1.1: “Encourage” has not worked. Pinellas County should require a certain number of units designated for lower income in any approved housing project.
- e. HOU Strategy 1.3.1.6: Housing for low income and special needs populations. Suggest we look into SROs as a possibility with supportive services.
- f. HOU Policy 1.3.2: Prioritize affordable housing in concentrations of employment, accessible to public transportation and accessible to range of services is making assumptions about the nature of poverty and contributing to the warehousing of low-income populations in central areas.
- g. HOU Policy 1.4.2: “Allow?” housing for special needs populations in residential neighborhoods should read “encourage countywide”. What is a residential neighborhood? Do those with apartment buildings located near employment and public transportation qualify? This reinforces the notion that some people deserve to live in residential neighborhoods with certain protections while other are encouraged to live near industry and one major traffic routes.

4. Transportation

- a. Overall—limit development, especially on failed roads, and therefore limit population to current capabilities. Increase public transportation countywide to reduce auto usage.
- b. TRA Strategy:1.1.3.1: “address transportation inequity” I assume means to low income and not to middle and upper incomes who rely on private transportation. But it should be addressed to non-users of public transportation as well. This section appears to refer to disability and not income inequity which should be included.
- c. TRA Strategy 1.1.5.2: Be forward thinking and look at combining public school transportation with general public transportation into one system. This would bring public transportation to more parts of the county, offer a means for parents to engage the school and allow student participation in all special specialty schools throughout the county.
- d. TRA 1.1.8.3: add past equity issues here.

- e. TRA Goal 2: ‘support efficient land use patterns’ which are the result of inequities developed over the years. Equity goals need to be asserted here.
- f. TRA Policy 3.1.1: add the equity issue of past transportation decisions, such as I275, which needs to be changed.

5. Recreation, Open Space and Culture

- a. ROS Strategy 2.1.4.: “Maintain and enhance equitable access” How is this determined? Is the Parks and Conservation Advisory Board able to determine this? How will you ensure adequate representation?
- b. ROS Policy 3.1.2: “Acquire beach access sites that enhance equitable public access” Cost and transportation are limiting factors but are not addressed.
- c. ROS Goal 4: “Preserve history through Protection of Special Places and Resources”. This goal assumes concern for the history of BIPOC but does not state it. Heritage Village, for example, shows very little history of Black, Hispanic and early Native American populations. Even the cemeteries have been paved over.

6. Governance

- a. GOV Policy 2.2.1 Must include equitable
- b. GOV Policy 3.1.2 Must include equity issues in capital improvement goals.
- c. GOV Policy 3-4-11: Include equity in this statement.
- d. GOV Policy 3/4/12: Include equitable and historic equity.
- e. GOV Policy 3.5.1: Includes both recreational and environmental lands—perhaps they should be separated as environmental lands are not used for recreation.
- f. Gov Policy 3.5.2. is poorly written and does not set standards for amending.
- g. GOV Goal 4: “Equitable improve the county’s health” is not clear. Are we directing information and resources towards resolving past inequities or continuing business as normal?

Thank you for listening to our concerns. It is our goal that Pinellas County over the next ten years becomes and place, not just for some, but for all--- to live and prosper. This plan is important in setting the goals to achieve this. We thank you for your time and your concern. Should you want any additional information, please contact Beth and she will bring it to our committee.